

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ROBERT FRANCIS LOPEZ ACEVEDO

DEBTOR

CASE NO 14-02177-MCF

CHAPTER 13

**DEBTOR'S REPLY TO *TRUSTEE'S MOTION IN COMPLIANCE*  
*WITH COURT ORDER DKT 44***

**TO THE HONORABLE COURT:**

**NOW COMES, ROBERT FRANCIS LOPEZ ACEVEDO**, debtor in the above captioned case through the undersigned attorney, and very respectfully states and prays as follows:

1. On January 29, 2015, the Chapter 13 Trustee has filed a motion in compliance with Court Order, docket #44, basically alleging that the debtor's current Plan base is insufficient to comply with the proposed disbursement schedule to pay secured claims, since the debtor is not considering in his calculation the 5.95% interest included in proof of claim 2-1.

2. The debtor respectfully submits that on January 29, 2015, secure creditor Primera Cooperativa filed an amended proof of claim 2-2, which eliminates the 5.95% interest included in proof of claim 2-1.

3. Based on the above mentioned, the debtor understands that the proposed Chapter 13 Plan, docket #29, is sufficiently funded to comply with the disbursement schedule to pay secured claims and that the Trustee's motion in compliance with Order, docket #44, has become moot.

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Reply to Trustee's Motion in Compliance with Order  
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**WHEREFORE** debtor respectfully requests the Court deny Trustee's motion in compliance with Court Order, docket #44, in the above captioned case.

**I CERTIFY** that on this same date a copy of this notice was sent by the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the debtor, Robert Francis Lopez Acevedo, to the address of record: RR 1 Box 3233-3 Cidra, PR 00739.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico this 30<sup>th</sup> day of January, 2015.

/s/ Roberto Figueroa Carrasquillo  
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